

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION**

AUSTIN HAMBLIN and KISKA HAMBLIN	§	
	§	
vs.	§	
	§	NO: 7:25-cv-00245
MARTIN COUNTY SHERIFF'S	§	
DdEPARTMENT, BRAD INGRAM,	§	
ANDERS DAHL, KELSEY BROWN,	§	
RORY GAMMONS, AND	§	
WESLEY PHELPS	§	

DEFENDANTS' ANSWER TO PLAINTIFF'S COMPLAINT

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW, Martin County Sheriff's Department, Brad Ingram, Anders Dahl, Kelsey Brown, Rory Gammons, and Wesley Phelps, Defendants, in their official capacity, in the above-styled and numbered cause, and files this their Answer to Plaintiffs' Complaint, and would respectfully show the Court as follows:

DEFENDANTS' ANSWER TO PLAINTIFFS' COMPLAINT:

1. Defendants admit the allegations in paragraph 1 of Plaintiffs' Complaint.
2. Defendants admit the allegations in paragraph 2 of Plaintiffs' Complaint.
3. Defendants admit the allegations in paragraph 3 of Plaintiffs' Complaint.
- II-1. Defendants admit the allegations in paragraph II-1 of Plaintiffs' Complaint.
- II-2. Defendants admit the allegations in paragraph II-2 of Plaintiffs' Complaint.
- II-3. Defendants admit the allegations in paragraph II-3 of Plaintiffs' Complaint.
- II-4. Defendants admit the allegations in paragraph II-4 of Plaintiffs' Complaint.
- II-5. Defendants admit the allegations in paragraph II-5 of Plaintiffs' Complaint.
- II-6. Defendants deny the allegations in paragraph II-6 of Plaintiffs' Complaint.
- II-7. Defendants deny the allegations in paragraph II-7 of Plaintiffs' Complaint.

- II-8. Defendants deny the allegations in paragraph II-8 of Plaintiffs' Complaint.
- II-9. Defendants admit the allegations in paragraph II-9 of Plaintiffs' Complaint.
- II-10. Defendants deny the allegations in paragraph II-10 of Plaintiffs' Complaint.
- II-11. Defendants deny the allegations in paragraph II-11 of Plaintiffs' Complaint.
- II-12. Defendants deny the allegations in paragraph II-12 of Plaintiffs' Complaint.
- III-1. Defendants deny the allegations in paragraph III-1 (a-d) of Plaintiffs' Complaint.
- III-2. Defendants deny the allegations in paragraph III-2 of Plaintiffs' Complaint.
- III-3. Defendants deny the allegations in paragraph III-3 (a-d) of Plaintiffs' Complaint.
- III-4. Defendants deny the allegations in paragraph III-4 of Plaintiffs' Complaint.

AFFIRMATIVE DEFENSES

Defendants assert the defense of immunity, both absolute and qualified, for all allegations alleged in Plaintiffs' Complaint.

Defendants affirmatively plead that Plaintiffs' damages, if any, were caused as a result of his own action or inactions.

Defendants affirmatively plead that they are employees of a governmental entity and as the entity's employees, are protected by official immunity, as all actions or inactions were performed as discretionary duties in good faith and within the scope of their authority at the time Plaintiffs' claims arose.

Defendants affirmatively plead that there is no official policy or custom of Martin County adopted by Martin County that resulted in any damages to the Plaintiff.

Defendants seek recover of attorneys' fees and costs as provided by law.

WHEREFORE, PREMISES CONSIDERED, Defendants pray that Plaintiffs take

nothing against these Defendants and that Defendants be dismissed and recover all costs incurred, including attorney's fees and such other, further relieved to which they may show themselves justly entitled.

Respectfully submitted,

/s/ Denis Dennis
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OF

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CERTIFICATE OF SERVICE

I certify that on the 27th day of May, 2025, a true and correct copy of the above and foregoing was sent to the Plaintiff via:

/s/ Denis Dennis
DENIS DENNIS